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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DANIEL TORRES, an individual,
Plaintiff,

vs.

GOLDEN NUGGET CASINO, et al.,
Defendants.

Case No. 2:19-cv-00072-JCM-BNW

STIPULATION TO VACATE ALL DEADLINES AND HEARINGS

The parties in the above-referenced case, by and through their counsel, submit this Stipulation to Vacate all Deadlines and Hearing Dates. The Parties have filed a Notice of Settlement (docket no. 45). The parties to this action have reached a settlement agreement (“Release”), which has been executed. The only remaining issue to complete the settlement is for Defendant to tender the settlement funds to Plaintiff, which is estimated to take 30 days or less. The parties intend to file a joint request for dismissal as soon as practicable but request 45 days from the date of this Notice to complete the terms of the settlement and file a joint request for dismissal.

In light of this settlement, and pursuant to Local Rules 7-1 and IA 6-2, the Parties, by and through their respective counsel, stipulate and agree as follows:

WHEREAS, the Parties have agreed to settle the matter in accordance with the terms set forth in the Release, which has already been executed;

1 WHEREAS, there are various deadlines and hearings established by this Court as set forth
2 in the Scheduling Order (docket no. 35) and the Minute Order setting the hearing on Plaintiff's
3 Motion to Extend Time currently set for November 4, 2019 (docket no. 42);

4 WHEREAS, the Parties expect such conditions of settlement (payment) to be completed
5 within 30 days of the filing of this Stipulation;

6 WHEREAS, the Parties stipulate and respectfully request that the Court vacate all
7 deadlines governing this case and all hearings, including the hearing on Plaintiff's Motion to
8 Extend Time currently set for November 4, 2019, with the understanding that Plaintiffs will file a
9 request for dismissal of the Action following receipt of payment of the settlement funds; in the
10 unlikely event that the settlement conditions are not completed within the time agreed by the
11 Parties, Plaintiff will request a further case management conference to set new case management
12 deadlines.

13 NOW THEREFORE, the Parties stipulate and respectfully request that the Court vacate all
14 deadlines and hearings in this case.

15 Plaintiff is filing this Stipulation with the Defendant's approval and permission.

16 Dated: October 8, 2019
17

18 /s/ Raymond E. Areshenko
19 Raymond E. Areshenko, Esq.
20 Nevada Bar No. 13659
21 Attorney for Plaintiff
Daniel Torres

/s/ Robert Molina
Robert Molina, Esq.
Nevada Bar No. 6422
Attorneys for Defendant
GNLV, LLC

22 **IT IS SO ORDERED. IT IS**
23 **FURTHER ORDERED that the**
24 **parties are to file a stipulation**
25 **to dismiss by November 25,**
26 **2019. If no such stipulation is**
27 **filed by this date, the parties**
28 **are to file a joint status report**
on November 25, 2019 stating
what is impeding the
completion of settlement and if
or how the court can assist.

IT IS SO ORDERED: 

UNITED STATES MAGISTRATE JUDGE

DATED: 10/11/19

1 **PROOF OF SERVICE**

2 I am over the age of 18 and not a party to the within action. On October 8, 2019, I served
3 the within document(s) described as:

4 **STIPULATION TO VACATE ALL DEADLINES AND HEARING DATES**

5 on the interested parties in this action as stated on the attached mailing list.

6 ☐ (BY MAIL) By placing a true copy of the foregoing document(s) in a sealed envelope
7 addressed as set forth on the attached mailing list. I placed each such envelope for
8 collection and mailing following ordinary business practices. I am readily familiar with
9 this Firm's practice for collection and processing of correspondence for mailing. Under
10 that practice, the correspondence would be deposited with the United States Postal Service
on that same day, with postage thereon fully prepaid at Reno, Nevada, in the ordinary
course of business. I am aware that on motion of the party served, service is presumed
invalid if postal cancellation date or postage meter date is more than one day after date of
deposit for mailing in affidavit.

11 ☐ (BY ELECTRONIC MAIL) By sending a true copy of the foregoing document(s) in an
12 electronic email addressed as set forth on the attached mailing list.

13 ☒ (BY CM/ECF ELECTRONIC FILING SYSTEM) via the Court's CM/ECF electronic
14 filing system addressed to all parties on the e-service list.

15 Executed on October 8, 2019, at Reno, Nevada.

16 I declare under penalty of perjury under the laws of the State of California that the
17 foregoing is true and correct.

18 _____
RE Law employee



19 _____
(Signature)